THE MISSOURI PUBLIC SERVICE COMMISSION STATE OF MISSOURI

In Re: Union	Electric Company's)	
2008 Utility	Resource Filing pursu-)	EO-2007-0409
ant to 4 CSR	240 - Chapter 22.)	

RESPONSE BY NORANDA ALUMINUM, INC. TO SEPTEMBER 26, 2008 FILING OF AMERENUE

COMES NOW Noranda Aluminum, Inc. (Noranda) by its attorney, and states:

- On September 29 AmerenUE made a filing in this docket captioned AmerenUE's Response to September 26, 2008, Filings.
- 2. Paragraph 5 of that pleading incorrectly suggests that Noranda's silence amounts to Noranda's agreement that no hearing is necessary.
- 3. Indeed, Noranda's concerns regarding the quality of the analysis contained in the Integrated Resource Plan (IRP) continue. In our August 20, and September 12, 2008 submissions, 1 Noranda identified three major issues that, highly summarized, remain:
 - The revenues used for the comparative studies of alternatives do not include construction work in progress (CWIP), yet AmerenUE's public statements, as well as those included in its recent COLA,

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[&]quot;Response and Statement of Noranda Aluminum, Inc. Regarding Partial Stipulation and Agreement," submitted August 20, 2008; "Comments by Noranda Aluminum Inc. Regarding Other Parties' Assertions of Plan Deficiencies," submitted September 12, 2008.

suggest that construction will not go forward unless Missouri law is changed to permit CWIP/;

- the uncertainty analysis appears to be flawed and deficient resulting from the differing positions regarding CWIP; and
- the absence of a life extension study concerning the Meramec plant, as well is its essentially concurrent retirement with the suggested operational date of any additional nuclear generation raise questions about the level of due diligence that has been applied to those aspects of the IRP.
- 4. Nor should Noranda's silence be presumed to prejudge the positions of other parties. We would expect to address these matters if requested by the Commission at the October 7. 2008 on-the-record conference.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by electronic means or by U.S. mail, postage prepaid, addressed to all parties by their attorneys of record as disclosed by the pleadings and orders herein.

Stuart W. Conrad

Dated: October 6, 2008

71065.3 - 3 -